

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: MICHELE RAE ROUSE fka MICHELE LOFGREN dba
QUALITY SAFETY SERVICES LLC**

Debtor

: CASE NO: 1-20-03497

LAKEVIEW LOAN SERVICING, LLC

Movant

: CHAPTER 13

**MICHELE RAE ROUSE fka MICHELE LOFGREN dba
QUALITY SAFETY SERVICES LLC**

Debtor

CHARLES J. DEHART, III ESQ.

TRUSTEE

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY
OF LAKEVIEW LOAN SERVICING, LLC**

- 1. ADMITTED.**
- 2. ADMITTED.**
- 3. ADMITTED**
- 4. ADMITTED.**
- 5. ADMITTED.**
- 6. ADMITTED, that Debtor has failed to make monthly mortgage payments for the months of February through April due to a temporary reduction of business activities which is expected to return to normal.**
- 7. ADMITTED, that the total amount due is \$ 2,226.06.**
- 8. ADMITTED.**

9. ADMITTED.

10. Debtor will file an Amended Chapter 13 Plan to pay post- petition arrears.

WHEREFORE, Debtor prays that this Motion be Dismissed and allow Debtor to Amend her Chapter 13 Plan to pay the post-petition arrears.

Respectfully submitted,

**/s/ Larry W. Wolf, Esquire
215 Broadway
Hanover, PA 17331
PH (717) 632-0067**